

Questions and Comments regarding proceeding # 02-278

Questions:

We want to make sure we are in compliance with the new regulations and have several questions.

- 1) Our chapters conduct their elections via fax – is this permissible?
- 2) We notify members of the bylaw-required annual membership meeting via fax - is this permissible?
- 3) I understand we must obtain permission for every fax number we wish to use. Here at CTAM, we have a main fax line which when busy, automatically rolls over to a different fax number. If we are only sending to the main number, do we have to get permission for the roll-over lines as well?
- 4) If a member gives permission and then moves to another company, does the permission go with him/her?
- 5) Does the permission have an expiration date?
- 6) Can we fax dues invoices and renewal notices?
- 7) Must we retain copies of the permissions? If so, for how long?
- 8) If someone requests that we fax them information and a registration form for the conference, do we have to get written permission first? And, if we can't fax the permission, do we have to mail it, thus waiting for days before we can fax them the information they just requested?

Comments:

We do not send promotional faxes to the general public, only those with whom we have an established business relationship. For CTAM, that means members who pay dues to be kept informed of our programs and services. We have always asked them if they prefer not to receive faxes and/or emails and we honor their wishes.

These new rules will have a ripple effect that will hurt the U.S. economy. Less people will attend meetings, which means less money for airlines, taxi drivers, hotels, restaurants, etc. We just don't have the budget to send everything out by mail, especially for small regional meetings that are planned on the fly. Less people will renew their membership because 1) they didn't get the renewal notice, and 2) they don't get faxed notices of programs and services, lowering the perceived value of membership. This will cripple the effectiveness of associations who exist to educate their members, police their industries (so the government doesn't have to), and/or provide valuable services to the general public.

CTAM chapters, which are manned by volunteer members, do not have the time or resources to adhere to the new rules. Our chapters will in effect, be forced out of business due to the additional administrative burden.

In addition to having add new programming to our database, update our Web site, and allocate additional man-hours to track permissions, we will be forced to re-print our membership applications and renewal invoices to include a request for permission to fax. We just re-printed them a few months ago and several years worth of inventory in stock, so this poses an immediate financial burden on us.

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